

Eileen S. Stommes, Deputy Administrator
USDA-AMS-TM-NOP, Room 4007-So.

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Docket # TMD-94-00-2

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Dear Ms Stommes,

I am writing inform you that the National Organic Program Proposed Rule, as written, is an unlawful implementation of the Organic Foods Production Act of 1990. The Proposed Rule is at variance with the Act generally and specifically, in creating new definitions and policies, and in allowing materials and substances that are not now acceptable for organic production.

The USDA's proposed organic standards should follow the recommendations from the organic sector, especially from the National Organic Standards Board. Defining organic should not be a product of political pressure or input from outside the organic sector.

There should be no place in organic production for intensive livestock confinement, feeding rendered animals to cows or other herbivorous livestock, and policies or procedures which favor industrial-type farming over small family farms--such as high certification fees and relaxed standards governing additives and synthetics.

The standards should prohibit genetic engineering and irradiation, used either directly or indirectly in foods, processing agents, flavorings, colorings, additives, enzymes, livestock feed, fertilizers, or other agricultural inputs. These have never been a part of the organic tradition, and there's no reason for them to be included now. The same is true for municipal sewage sludge and use of toxic land for agricultural purposes.

For additional issues that relate more directly to the farmers than to consumers, I urge you to follow the recommendations of the organic farmers themselves, individually and through their associations and accreditation bodies. They are the ones who have made the organic label what it is today, and it is their example that should guide creation of the Proposed Rule.

Sincerely yours,